



U.S. Department of Justice

Civil Division

EBK

Telephone: (202) 616-9123

Washington, DC 20530

VIA CM/ECF

March 22, 2025

Hon. Elizabeth C. Coombe
U.S. District Judge
Northern District of New York
Federal Building and U.S. Courthouse
P.O. Box 7255
Syracuse, N.Y. 13261

Re: Taal, et al. v. Trump, et al.,
3:25-cv-335-ECC-ML
Request to Accept Late, Oversized Brief

Dear Judge Coombe:

I write to respectfully request that the Court accept the government's late-filed and oversized brief in opposition to Plaintiff's Motion for Preliminary Injunction and Temporary Restraining Order.

Following the March 15, 2025 filing of Plaintiffs' motion, on March 19, 2025, the Court ordered expedited briefing in the case, with Defendants' response to be filed by March 22, 2025 at 5:00 p.m. ET. Dkt. 19 (Minute Order). On March 21, 2025, the Court directed Defendants include in their response brief a response to an Emergency Motion for a Temporary Restraining Order and Order to Show Cause, filed by Plaintiffs on March 20, 2025. Dkt. 23; Dkt. 27 (Minute Order). The Court also ordered Defendants to address a particular issue raised by a March 21, 2025, email from Defendants' counsel to Plaintiffs' counsel. Dkt. 27 (Minute Order).

Although the government worked diligently to meet the Court's 5:00 p.m. ET deadline, we were unable to timely file because we were finalizing the filing's attachments, and we respectfully request that the Court accept our late filing. Additionally, while the government proceeded with all deliberate speed and diligence to respond to the issues raised in Plaintiffs' two motions and the issues raised by the Court's subsequent orders within the 25-page limit applicable to our brief, given the limited time, we respectfully request two additional pages. The government recognizes this is outside the default page limits for responses under the local rules and sincerely apologizes for the late filing and oversize brief.

I contacted Plaintiffs' counsel to seek their consent to this request, alerting them that we would file this letter motion shortly after the email. Thus, I do not know Plaintiffs' position with respect to this request

Thank you for your consideration of this matter.

Respectfully submitted,

s/ Ethan B. Kanter

ETHAN B. KANTER

Chief, National Security Unit

Office of Immigration Litigation

Civil Division

U.S. Department of Justice

P.O. Box 878, Ben Franklin Station

Washington, DC 20044

(202) 616-9123

Counsel for Defendants